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Dear Stakeholders:

Thank you for your October 6, 2015 letter regarding Clean Air Act (CAA) compliance of Hickman Family Farms and Hickman's Egg Ranch, Inc. of Tonopah, Arizona, and for your November 6, 2015 email regarding requirements for reporting ammonia releases through EPCRA Sections 304 and 313. This facility is not subject to Toxic Release Inventory (TRI) reporting requirements based on the NAICS Code for "Chicken Egg Production 112310" [see also "The TRI Threshold Screening Tool" on EPA's homepage at [https://cdxnodengn.epa.gov/cdx-tri-threshold/action/Fac\\_05](https://cdxnodengn.epa.gov/cdx-tri-threshold/action/Fac_05)].

We reviewed our files and contacted the appropriate state and local regulators to ensure that the Hickam Egg Ranch, Inc. facilities were in compliance with all applicable federal, state and local environmental regulations. Based on our review of Maricopa County and Arizona Department of Environmental Quality compliance inspections, the permit history and technical support documentation of this facility, the applicable state/county regulations all appear to apply to industrial equipment, with the exception of some agricultural BMPs for particulate matter control. Also, the potential to emit of industrial equipment at the facility, such as emergency generators, storage tanks, dryers, etc, are well below Title V major source thresholds.

ADEQ conducted inspections on 8/10/2015 and 2/11/2015 at Hickman's Egg Ranch in response to numerous citizen complaints, and the inspector observed "No deficiencies were noted during the course of the inspection." The Maricopa County Air Quality Department provided a summary to us of its 163 total inspections since 11/20/2014, of which only a few

minor violations were uncovered during the inspection. The violations were corrected promptly by Hickman's Egg Ranch, Inc.

Again, we appreciate the public health and environmental concerns raised in your October 6, 2015 letter and thank you for your inquiry. If you have further questions, please contact me or your staff may contact Joel Jones, Assistant Enforcement Director, at 415-972-3449.

Sincerely,

Kathleen H. Johnson, Director  
Enforcement Division

Enclosure

cc: Eric Massey, ADEQ  
Phillip McNeely, Maricopa County Air Quality Department